



**STATE OF DELAWARE
PUBLIC SERVICE COMMISSION**

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April 3, 2013

VIA EMAIL TO Traci.Randolph@fcc.gov:

Ms. Traci Randolph
Telecommunications Accessibility Specialist
Disability Rights Office
Consumer & Governmental Affairs Bureau
Federal Communications Commission

WITH COPY VIA EMAIL TO Dana.Wilson@fcc.gov:

Ms. Dana Wilson
Federal Communications Commission
Consumer and Governmental Affairs Bureau
445 12th Street, SW
Room 3-C418
Washington, DC 2055

RE: Supplemental Information for the Application for Renewal of Certification
of the State of Delaware's Telecommunications Relay Services ("TRS")
Pursuant to 47 C.F.R. §64.606(c)
CG Docket No. 03-123

Dear Ms. Randolph:

On March 21, 2013, you emailed me and requested supplemental information or clarification regarding the application filed by the Delaware Public Service Commission ("DPSC") for the renewal of certification of the State of Delaware's TRS program. Below are responses to your questions:

1. p. 23 of the "Services Agreement between Verizon Services Corp. and Spring [sic] Communications Company, LP" (Agreement No. C0506749) at 2.2 w "Supplier will not provide 976 pay-per-call functionality," yet p. 12 of the narrative indicates that Sprint processes pay-per-calls for Delaware Relay. Please explain the discrepancy in order to confirm compliance with 47

§ 64.604(a)(3)(iv) Relay services must be capable of handling pay-per-call calls.

RESPONSE:

The DPSC contacted representatives of Sprint and received this answer:

“Sprint does and will continue to provide access to pay per calls via numbers with the 900 prefix. Sprint does not provide access via 976 (local pay per call numbers) which have declined drastically in use in favor of the more interactive nature of 900 calling. In fact, Sprint has not had a request or complaint regarding pay per call services in Delaware during the past current certification period of five years. Sprint does not recommend implementing 976 service unless mandated by the FCC and until the TRS provider receives efficient and effective interconnection and billing mechanisms from the local exchange companies. In any event the FCC’s rule in this regard requires that pay per call service be provided; it does not specify the prefix to be used.”

Thus, Sprint does, in fact, process pay-per-calls in Delaware for the State of Delaware’s TRS program as required by 47 C.F.R. §64.604(a)(3)(iv).

2. Your applications notes that until January 1, 2013, TRS was not funded by subscribers, but starting January 1, 2013, subscribers pay up to \$.04 a month. Please submit a copy of a subscriber’s bill, or provide the exact language contained on a subscriber’s bill, in order to confirm compliance with 47 § 64.606(d) State funding mechanisms, if labeled, must be labeled in a way to “promote national understanding of TRS” and that does not “offend the public.”

RESPONSE:

Although starting January 1, 2013, Delaware law requires that all telecommunications providers impose and collect a surcharge for TRS, the State of Delaware does not require that any particular language be used by such providers. Nevertheless, the DPSC has collected sample language from two of the major telecommunications providers in the State of Delaware.

As one example, Verizon Delaware LLC uses the following language on its subscriber bills:

“New Telecommunications Relay Service Fee

Effective January 1, 2013, the State of Delaware mandates a monthly fee of 2 cents per telephone line to pay for telecommunications service for

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those with special needs. Verizon collects the fee and pays it to the fund administrator.”

As another example, the Sprint Billing Group simply lists as a line item on its subscriber bills under “Government Fees and Taxes” the following:

“State - TRS Charge - \$0.02”

I trust that my responses have fully answered your questions. I would greatly appreciate it if you would please file this email in ECFS as a supplement to the State of Delaware’s TRS application.

Sincerely,



Robert J. Howatt
Executive Director
Delaware Public Service Commission

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